

High-Level Response to Comments Summary – April 24, 2012

The draft Action Agenda was available for public comment from December 10, 2011 to February 3, 2012. A total of 90 comment letters were received. In addition, over 1,000 postcards and emails were received. The letters ranged in length from one to twenty-seven pages. This document summarizes the main themes from the comments and describes how the Partnership has responded through revisions to the Action Agenda.

In addition to general comments on the scope and direction of the Action Agenda, the Partnership received numerous, detailed comments on the specific language of various strategies, sub-strategies and near-term actions. As part of responding to these comments, the Partnership has had conversations with many of the commenters individually and in groups. All entities that would be responsible for implementation of the action have participated in conversations about NTA revisions and reviewed revised draft actions. Detailed responses for each specific comment are summarized in a spreadsheet that will be available when the Leadership Council is asked to endorse the Action Agenda.

COMMENT THEMES AND RESPONSES

1. Improvements from 2008.

A number of commenters noted improvements from the 2008 Action Agenda in both content and process. Commenters expressed support for the efforts to consult with experts and interested parties during development of the recovery targets and development of the draft Action Agenda content and to include Partners in Action Agenda development. Commenters also expressed support for the efforts to improve transparency in the Action Agenda, increase accountability, respond to legislative mandates and the JLARC report, and create a good foundation for future updates and improvements.

2. The Action Agenda is too long and complex and lacks a strategic focus.

A. The Action Agenda is too long.

The Action Agenda is long. This length is necessary to present a complete picture of the strategies and actions needed to protect and recover Puget Sound. In addition, although many commenters expressed concern about the length of the Action Agenda, at the same time they suggested numerous additional actions, strategies, and issues to be included. This is one of the fundamental dilemmas the Partnership, as the coordinating agency for Puget Sound recovery, is working to manage: the desire for a clear, simple path to recovery and a set of priorities and the need to describe, and preserve commitment and funding for, all the work needed to protect and recover Puget Sound. In response to this concern, the Partnership proposes the concept of strategic initiatives which are the three priority focus areas for action for the next two years. We have also drafted a high level summary that can stand alone from the longer version of the Action Agenda that “shows the work” involved in identifying strategic actions and their connections to achievement of our goals. The Partnership will continue to coordinate with partners to identify a short and focused set of actions, drawn from the existing near term actions, to populate the three strategic initiatives.

B. The Action Agenda is too complicated.

The Action Agenda is comprised of strategies, sub-strategies, descriptions of ongoing programs, new actions, future opportunities, plus local priorities that are presented both with the soundwide actions and in the local profiles. The Action Agenda is organized primarily by major ecosystem component and work area because that is primarily how the work to protect and recover Puget Sound is organized – in the programs focused on land development, shoreline protection, and pollution prevention and control. Target views throughout the document demonstrate how strategies and actions will result in progress towards our recovery goals.

We have made significant efforts to simplify the Action Agenda and make it easier to navigate in response to comments. These include:

- Developing the strategic initiative concept as a clear articulation of the most important priorities for action in 2012/2013.
- Reducing the number of strategies and sub-strategies by combining related ideas.
- Reducing the number of near-term actions and working with action owners to clarify action content and expected outcomes.
- Moving the majority of the Open Standards for Conservation Result and Logic Chain diagrams to an appendix.
- Moving the local strategy information into tables (as opposed to text boxes) throughout.
- Working to edit and simplify language throughout.

C. The Action Agenda has too many moving parts.

Commenters who expressed concern over the complexity in the Action Agenda often expressed concern that the Action Agenda has too many “moving parts.” We considered this concern very seriously but were not able to further collapse the Action Agenda at this time. The 2012/2013 Action Agenda already has one fewer levels of organization than the 2008 Action Agenda (i.e., the A.1.1.1 level was eliminated to consolidate ideas into either sub-strategies or near term actions); at this time we felt unable to collapse it further. We have worked to make the document structure clear through formatting and to provide easy-to-use tables that summarize the most operative part of the Action Agenda: the sub-strategies and the near term actions.

Complexity in the Action Agenda also is a function of the Partnership wanting to address partner requests to demonstrate how the strategies and actions work together to contribute towards achievement of recovery targets. Target views were provided as an additional layer, or perspective, on the Action Agenda content in response to numerous comments received during development of the draft Action Agenda emphasizing the need to show how strategies and actions from various parts of the Action Agenda would work together to achieve targets. Some commenters, in fact, recommended that the Partnership organize the Action Agenda according to targets instead of more traditional ecosystem or programmatic areas. The Partnership has not reorganized the Action Agenda into separate sections

oriented towards each target because there is a many to many relationship between actions and targets and the current approach is the most clear and simple way to present those complex relationships.

In the future we would like to work with partners to further improve, and where possible, simplify the organization of the Action Agenda. The effort to “publish” the Action Agenda primarily as an online document with linked navigation may also address this need by enabling more direct connections between multiple endpoints and easier sorting by various interests or perspectives.

D. The Action Agenda does not establish a clear strategic focus or establish clear enough priorities.

The draft Action Agenda proposed three strategic initiatives to create the strategic focus on a small number of actions that could be implemented in the near-term to make progress on high-priority Puget Sound pressures. The proposed strategic initiatives were: prevention of urban runoff; habitat protection and restoration in support of salmon recovery; and shellfish bed recovery. These strategic initiatives received broad support in comments. (See discussion of strategic initiatives, below.) The draft Action Agenda also proposed a process to evaluate and score each near-term action and develop a prioritized action list. Commenters expressed strong support for a prioritization effort, but suggested significant changes to the approach proposed. (See discussion of prioritization, below.) Work on both of these efforts continues and the Partnership believes that, when complete, the products of these efforts will provide the strategic focus needed.

E. The Action Agenda does not create clear links between strategies, or provide enough synthesis and integration of the work.

The Partnership has worked to address this need in three ways – first, through the target views which look across the Action Agenda to identify the key strategies and actions that will contribute towards progress towards recovery targets. Second, through the strategic initiatives. Third, through the structure of the emerging prioritization process which considers, among other things, the “strength” of sub-strategies to protect or restore a range of ecosystem processes or reduce ecosystem pressures.

The Partnership agrees that this is an area where further improvements can be made and we look forward to working with partners on this effort.

3. The Action Agenda does not establish a clear path towards achieving 2020 recovery targets.

Commenters who raised this issue generally expressed two specific concerns (1) the Action Agenda does not establish interim milestones or critical path orientations so that progress towards recovery targets can be tracked, and (2) the Action Agenda is focused too narrowly on 2-year actions and does not identify every action that is needed to achieve targets.

The Partnership is developing a work plan to establish interim milestones for indicators. That work will happen through the next year. The Partnership will seek input and advice from partners prior to finalizing the work plan. The interim milestones may be either a number (such as acres of eelgrass recovered) or a trend that reflects progress towards the targets.

We do not agree that it is necessary or possible to identify every specific action that will be needed in the next eight years to achieve targets. Our region does not have sufficient knowledge to quantify how the ecosystem will respond to various actions or combinations of actions. We will monitor implementation of actions and overall ecosystem response. We will regularly update the Action Agenda based on lessons learned through monitoring. The sub-strategies established in this Action Agenda establish a durable framework for recovery that, in combination, will lead us towards achievement of our 2020 goals. Through attention to clear interim milestones, which we agree must be established, and through monitoring and adaptation we will refine the exact combinations of actions that will be needed to achieve our goals.

4. Strategic initiatives should be well focused and clear

Commenters expressed broad support for the concept of strategic initiatives and, largely, for the three specific initiatives proposed: prevention of pollution from urban runoff, protection of habitat in support of salmon recovery, and protection of water quality and nearshore habitat from rural and agricultural runoff. Some commenters suggested additional or alternative strategic initiatives, such as climate adaptation, or securing funding. Some other commenters suggested a broader framing of the habitat initiative to include both habitat protection and restoration, or to include all actions needed in support of salmon recovery. Some other comments expressed support for keeping the strategic initiatives more tightly focused and narrow. Commenters suggested strategic initiatives be carefully populated with “bold actions” that are easy to understand, and that the initiatives be carefully tied to progress towards recovery targets. Strategic initiatives, and comments on strategic initiatives, also were the subject of discussions with the Ecosystem Coordination Board after the public comment period closed.

After considering comments the Partnership proposes the following initiatives for adoption by the Leadership Council: prevention of pollution from urban runoff; protection and restoration of habitat in support of salmon recovery; and restoration of shellfish beds. Details of the actions to be included in each of these initiatives will be worked out by summer 2012.

Tribes and the Salmon Recovery Council have expressed support for the inclusion of restoration in the habitat initiative. The initiative on agricultural and rural runoff has been re-titled to refer directly to shellfish beds restoration; the Partnership believes this wording more clearly and simply expresses the intent and expected outcome of the initiative. Making progress on agricultural and rural runoff will be key to achieving shellfish bed recovery.

The purpose of strategic initiatives is to establish a clear set of priorities for 2012/2013. The sub-strategies and near-term actions in the Action Agenda create the menu from which the content of strategic initiatives will be drawn. After reviewing comments on the draft Action Agenda sub-strategies and actions and working with Partners to begin to “set” the final Action Agenda content in response to comments, the Partnership turned its attention to populating the strategic initiatives from this emerging final Action Agenda content.

In March, the Partnership brought a draft refined set of strategic initiatives and an outline of initiative content to the Ecosystem Coordination Board for discussion. There was continued support for the three

initiatives, but some concern that the content of the initiatives would require additional review and vetting. Some ECB members also offered specific comments on the content of the initiatives. Some other ECB members provided written comments on the content of strategic initiatives after the meeting. In early April, in response to ECB requests for additional review, the Partnership provided a revised draft of strategic initiative content. A number of ECB members expressed serious concerns over potential gaps or other flaws in the content and urged the Partnership to take additional time to work with the ECB. In response to these comments, the Partnership is delaying action on the content of the strategic initiatives to allow more time to work with Partners to refine the content of the strategic initiatives.

5. The prioritization process is critical and the proposed approach is flawed

The Partnership received extensive comment on the proposed process to prioritize near-term actions. Commenters expressed overwhelming support for the concept of prioritization and for the Partnership's efforts to structure a prioritization process that would be transparent, science-based, and involve regional experts. At the same time, commenters expressed a range of views, and questions, about the specifics of the proposed approach.

A workgroup of the Ecosystem Coordination Board was formed to discuss comments on the prioritization process and to refine the prioritization approach. In consultation with this workgroup the Partnership Science Director worked with members of the Science Panel who have expertise in decision support to develop a revised approach to prioritization to the Ecosystem Coordination Board for discussion. The revised approach, which was endorsed by the ECB, involved using a science-based effort to score individual sub-strategies based on their expected ecological impact to create a ranked list of sub-strategies. Information about other benefits (or potential costs) associated with each sub-strategy and implementation issues was captured as supplemental information and presented with the ranked list. It was determined that sub-strategies would be more appropriate for prioritization.

Once a framework for prioritization that was consistent with guidance from the ECB and Science Panel was developed, the Science Director worked with the Science Panel (as recommended by the ECB) to develop a scoring system to evaluate the expected ecological impact of each sub-strategy. The scoring system was built out using an on-line survey interface and 40 scientists from ECB participating organizations completed an initial round of scoring. Information on other benefits (and potential cost) was gathered from the scientists who participated in scoring and from the broader partnership community. Information on how sub-strategies supported (or might not support) tribal treaty rights was solicited from the tribes. The tribal information was not yet available before the April 26 Leadership Council meeting.

The results of the first round of scoring were discussed with the ECB in March. ECB members continued to express support for the prioritization effort but had serious concerns about using the first attempt at scoring and creating a ranked list of sub-strategies as the basis for Action Agenda prioritization. These concerns ranged from technical aspects of the scoring and ranking process, such as how the scoring ranges were presented and whether all scorers had used the same assumptions in scoring, to concerns that the information on human well-being and economics was not adequately represented or

considered. Key partners expressed unwillingness to support even a preliminary ranked list at this point. In response to these concerns the Partnership has decided to delay release of the ranked list of sub-strategies to allow for additional time to refine the scoring and ranking process in hopes of creating a list that partners understand and will support. The Partnership is committed to finishing this process and publishing a ranked list by summer 2012, but it will need the help of partners to meet this goal. (Note that “ranking” as discussed by the ECB is the process of creating a list that shows which sub-strategies are expected to provide the most ecological benefit to Puget Sound. The rank order of the list is based on expected ecological impact. Prioritization is a broader process that involves consideration of the ranked list and other information such as human well being and economic issues to identify priority initiatives and actions.)

6. Ongoing programs are not effectively captured or integrated into the Action Agenda

Ongoing programs are the foundation on which Puget Sound recovery is based. The 2008 Action Agenda did not distinguish between ongoing work and existing programs and new work (or program enhancements or modifications) needed to protect and recover Puget Sound. One of the Partnership’s goals in the 2012/2013 Action Agenda process was to work with partners to more clearly make this distinction, to more fully and prominently capture the work of ongoing programs, and to emphasize that these programs must be adequately resourced to support Puget Sound protection and recovery.

The 2012/2013 Action Agenda includes text descriptions of a representative selection of ongoing programs (but not necessarily a complete inventory) as a way of introducing sub-strategies; and, where they were provided by partners, includes lists of key activities of ongoing programs focused on describing program outcomes that are important for Puget Sound protection and recovery. The 2012/2013 Action Agenda represents important progress in capturing the work of ongoing programs and we are committed to working with partners to improve the ongoing program information in later Action Agenda updates. The ongoing program descriptions in the 2012 Action Agenda primarily focus on state agencies. Federal agencies recently completed detailed work on federal programs in response to the treaty rights at risk paper. That work was available to the Partnership too late to be incorporated into the Action Agenda in a systematic way. Future versions of the Action Agenda will more completely include this information.

In a related effort, the Partnership will be undertaking an evaluation of ongoing programs as required by RCW 90.71.370 and will summarize the results of this effort in the State of the Sound report, and as appropriate, make related adjustments in future Action Agendas.

7. Ongoing program work should be prioritized with near-term actions

The Partnership agrees that we should be able to look across our investments in Puget Sound protection and recover to ensure that money is being wisely spent. Under the Legislation that established the Partnership we are required to evaluate ongoing programs and make recommendations. (See RCW 90.71.370.) The statute provides us a list of programs to evaluate and questions to ask about each

program. We will complete that evaluation by the end of 2012. On-going program evaluation work will be informed by the sub-strategy ranking process.

8. Tribal treaty rights

Commenters expressed concern that the Action Agenda should place more emphasis on protecting treaty rights and that it should better serve as an instrument to align state and federal programs to be consistent with protecting treaty rights. The Partnership anticipates guidance from Tribes on how sub-strategies support treaty rights and the content needed in strategic initiatives to support treaty rights. As of late April, the tribal information on the effect of sub-strategies on treaty rights was not yet available.

9. Local area information and local integrating organizations should be more prominent and better integrated

Commenters also expressed the concern some local areas need more time to develop and prioritize specific actions. The Partnership worked with representatives of the local areas address these concerns in the following ways:

- Continued support of local processes to identify, refine and prioritize local strategies and near-term actions. At this time, seven out of 10 local integrating organizations either have a short list of priorities to address, or specific working list of priorities under consideration. Five out of 10 LIOs identified near-term actions that can be tracked for implementation in this Action Agenda. Two LIOs are not yet formed, and some of the recently formed LIOs are actively working on refinement and prioritization of strategies and actions.
- Work with local areas to review and refine their local profiles, to ensure that the profiles describe local areas accurately and fully reflect the progress each has made to identify and prioritize local strategies and actions.

In addition the Partnership revised the presentation of the local strategies, so that they are featured more fully and more prominently at the beginning of each strategy section in which a local priority has been identified.

The Partnership agrees that the work of local areas is critical to Puget Sound protection and recovery and is committed to working with local areas to ensure their work is fully reflected in the Action Agenda. In the 2012/2013 Action Agenda the work of local areas has been integrated into the Soundwide protection and recovery strategies, so that priority local actions (where identified) are listed along with Soundwide actions. We will continue to work with local areas to more effectively reflect their efforts in future Action Agenda updates.

10. Federal actions should be better represented

There are 192 near-term actions in the 2012/2013 Action Agenda; of those two are “owned” (led) by a Federal agency. Several other actions have federal partnerships. The Partnership reached out to federal agencies throughout development of the Action Agenda draft by soliciting their involvement on the

Interdisciplinary Teams that developed draft content and through their participation on the Ecosystem Coordination Board. In early April, shortly before the Action Agenda was to be finalized, the Partnership received a detailed spreadsheet of ongoing federal actions and new actions, primarily related to a response to the Treaty Rights at Risk Paper, for consideration for the Action Agenda. The Partnership regrets that there was not time, at that point, to integrate these actions into the Action Agenda structure, or vet them with other Partners. Federal agencies will be consulted along with other partners when finalizing the strategic initiatives later this spring. Future versions of the Action Agenda can incorporate more federal ongoing programs and near-term actions.

11. The role of local governments should be better represented and local funding challenges more prominently acknowledged

The Partnership agrees that local governments are on the front lines of protection and recovery in Puget Sound and their work must be represented. As cities and counties are asked to redouble their efforts to protect and restore Puget Sound they must be given adequate support and resources to accomplish the job. We cannot expect more from them without providing the resources they need. The financial burden must be shared by all levels of government. The 2012/2013 Action Agenda includes a funding strategy that has many actions designed to secure higher levels of funding to support local government and other's efforts to implement priority actions for recovery. An ECB subcommittee is currently working on a gap analysis to determine sources and amounts being spent on strategic initiatives compared to the anticipated amount needed. That will inform a proposal for specific funding mechanisms later this year.

12. The importance of maintaining/improving economic health, along with ecosystem recovery, should be more prominently described

The Partnership agrees that maintaining and improving economic health are part of protecting and recovering Puget Sound. We agree with data that shows that Puget Sound is an economic driver for the region and have included this information in the Action Agenda. We already are seeing our investments in Puget Sound help to strengthen our economy and create jobs. In 2010 the investment in Puget Sound protection and restoration was in excess of \$239,667,446 in funding, which created 6494 jobs (3829 direct, 3015 indirect) across 434 projects. Economic considerations are expressly considered in establishing the direction of the strategic initiatives and in defining their content.

13. Near term actions are too ambitious (or not ambitious enough), and under funded

A. Near term actions as a group are too ambitious (or not ambitious enough)

Commenters expressed a range of views about the draft near term actions as a group and individually. A common theme in these comments was the concern that too many of the near-term actions are "process" or "study" oriented. The Partnership agrees that the time for action is now and has worked to motivate partners to develop near-term actions that are action oriented. Between the draft and final Action Agenda, Partnership staff worked with partners who own actions to better describe what any planning actions would lead to on-the-ground. More work with partners will be needed in this area.

Although there always will be a place for the planning, policy-making, and collaborative work that is necessary to lay the foundation for successful action, the 2012/2013 Action Agenda has a bias for ensuring that work, where needed, is clearly linked to a decision that must be made and a priority action that must be taken. In addition, the Partnership brought several ambitious actions suggested during the comment period to action owners. In some cases, these actions are now part of the final Action Agenda. In other cases, these new ideas did not have enough support, or even an owner, to move forward in 2012 and are listed in the future opportunities section.

B. Near term actions are underfunded

The Action Agenda is based on the assumption that the on-going work of our partners is essential to recovery and that that work must be fully funded. It also recognizes that existing efforts are not enough. Near term actions are expressions of what more is needed to achieve recovery goals. Given that near term actions are by definition additional work that is needed, it is not a surprise that they are viewed as underfunded. The near-term actions are a mix of funded, partially funded, and unfunded activities. The Partnership it is required to identify actions that are required to achieve recovery which includes, not just the actions that we think that we can afford. The Partnership also recognizes that funding is needed to achieve that additional work and has presented a strategy to be implemented by the ECB and other part of the management conference to increase the implementation capacity of our partners. As part of the improvements to the performance management process being developed with the 2012/2013 Action Agenda we will be able to better reflect the funding status of action in the Action Agenda.

14. Comments on climate change

Several comments noted that including climate change information in the Action Agenda is important, and that the draft did not go far enough toward including climate change information in each strategy area and incorporating the work conducted during development of the state climate response strategy. In addition, others noted that climate change should be included as a criterion in the prioritization process. The final 2012/2013 Action Agenda incorporates climate change more significantly than the December 2011 draft. *Preparing for Climate Change: Washington State's Integrated Climate Response Strategy* (April 2012) was nearly complete after the draft Action Agenda was released in December. The state strategy is now integrated throughout the strategy sections. The Action Agenda strategies and actions help implement the recommendations called for in the state strategy. The Action Agenda strategies and actions are part of the “no regrets” or “win win” adaptation efforts that both reduce existing stresses on the ecosystem and help prepare for a changing climate. Where possible, climate change is incorporated into the 2012/2013 Near-term actions. In addition, integration needs are identified in the future considerations sections. Climate change adaptation was added by the ECB as criterion in the sub-strategy ranking process. The Action Agenda also includes discussion of long-term considerations related to climate change including selection of indicators and targets beyond 2020. Puget Sound related climate impacts are summarized. The University of Washington Climate Impacts Group, in collaboration with the Puget Sound Partnership and Puget Sound Institute, is updating the

synthesis of climate science in Puget Sound to reflect the most-to-date impacts across Puget Sound and as geographically specific as possible.